



**Curtis, Mallet-Prevost, Colt & Mosle**

Almaty	Houston
Astana	London
Beijing	Mexico City
Bogotá	Milan
Brussels	Muscat
Buenos Aires	Paris
Dubai	Riyadh
Frankfurt	Rome
Geneva	Washington, D.C.

101 Park Avenue  
New York, New York 10178-0061

**Telephone +1 212 696 6000**  
**Facsimile +1 212 697 1559**  
www.curtis.com

**Kevin A. Meehan**  
Tel: +1 212 696 6197  
Fax: +1 917 368 8835  
E-Mail: kmeehan@curtis.com

May 29, 2025

**VIA ECF**

The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
United States District Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Estate of Tamar Kedem Siman Tov, et al. v. UNRWA, et al.**  
**24 Civ. 4765 (AT): Defendants' Position on Plaintiffs' Request for Leave to**  
**File Response**

Dear Judge Torres:

We write on behalf of Defendants United Nations Relief and Works Agency for Palestine Refugees in the Near East ("UNRWA"), Philippe Lazzarini, Pierre Krähenbühl, Filippo Grandi, Leni Stenseth, Sandra Mitchell, Margot Ellis, and Greta Gunnarsdottir (collectively, "Defendants"), to provide Defendants' position on Plaintiffs' letter dated May 29, 2025 [ECF No. 63], by which Plaintiffs seek leave to respond by June 13 to Defendants' response [ECF No. 62] to the Government's most recent letter [ECF No. 59]. Defendants respectfully request that, if Plaintiffs' request for leave to respond is granted, that the Court also grant Defendants leave to submit a reply brief by June 27, 2025.

Initially, we note that Defendants had sought in the interests of efficiency to avoid piecemeal applications by the parties (as are currently before the Court). On April 29, 2025, we requested that Plaintiffs' counsel consent to a briefing schedule that would have provided (1) Defendants a response to the Government's letter, (2) Plaintiffs a response to Defendants' response, and (3) Defendants a final reply to Plaintiffs' response. However, Plaintiffs rejected this proposal on the supposed grounds that a "full briefing schedule" was unnecessary. We therefore informed Plaintiffs that we would ask the Court only for leave to file a response to the Government's letter, but, if Plaintiffs subsequently requested leave to file their own response (as they have now done), we would in turn request leave to file a reply.



**Curtis, Mallet-Prevost, Colt & Mosle LLP**

The Honorable Analisa Torres  
May 29, 2025  
Page 2

Plaintiffs thereafter never sought our consent to their present request, but instead submitted it directly to the Court without apprising the Court of Defendants' position on the briefing schedule. *Cf.* Individual Practices in Civil Cases, Rule I C (requiring parties to state in requests for extensions of time whether the adversary consents). As a result, the briefing schedule remains unresolved.

To the extent the Court is inclined to grant Plaintiffs' request to file a responsive brief, Defendants request that they also be granted leave to file a reply brief. Such a reply is necessary because the Government has raised numerous complex issues that differ substantially from those addressed in the parties' prior briefing. Given that this briefing relates entirely to Defendants' Motion to Dismiss, it is proper and consistent with standard practice that Defendants as the moving party have the final reply. This would also place Defendants on equal footing with Plaintiffs as they were granted leave to file two briefs in response to the Government's submissions, including a final sur-reply. [ECF Nos. 19 and 41].

Thus, without prejudice to Defendants' assertion of immunity and their position that this case should be immediately dismissed, Defendants respectfully request the opportunity to reply to Plaintiffs' response by June 27, 2025.

Defendants reserve all rights, defenses, privileges and immunities and waive none. For the avoidance of doubt, neither this letter nor the appearance of defense counsel should be construed as a waiver of any kind.

Respectfully,

/s/ Kevin A. Meehan


Kevin A. Meehan

By **June 13, 2025**, Plaintiffs shall file their response to Defendants' letter at ECF No. 62. By **June 27, 2025**, Defendants shall file their reply.

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 63.

SO ORDERED.

Dated: May 30, 2025  
New York, New York

  
\_\_\_\_\_  
ANALISA TORRES  
United States District Judge